

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF OKLAHOMA

FILED

DEC 08 2021

By PATRICK KEANEY
Clerk, U.S. District Court
Deputy Clerk

UNITED STATES OF AMERICA,

Plaintiff,

v.

DALTON ELZIE HUNTER and
TERRY WAYNE HUNTER,

Defendants.

SEALED

Case No.

CR 21-376-RAW

INDICTMENT

The Federal Grand Jury charges:

COUNT ONE

CONSPIRACY
[18 U.S.C. § 371]

On or about October 26, 2021, in the Eastern District of Oklahoma, the Defendants, **DALTON ELZIE HUNTER** and **TERRY WAYNE HUNTER**, did knowingly and intentionally conspire, confederate and agree with others both known and unknown to commit offenses against the United States, in violation of Title 18, United States Code, Sections 922(g)(1) and 922(j), namely, Felon in Possession of a Firearm and Possession of a Stolen Firearm.

MANNER AND MEANS OF THE CONSPIRACY

In order to accomplish the objects of the conspiracy, the Defendants and other persons known and unknown to the Grand Jury:

1. Acquired guns or firearms to sell having reasonable cause to believe the firearms were stolen;

2. Concealed and moved evidence, contraband, and firearms to avoid detection and discovery by law enforcement;
3. Possessed and carried firearms to further their conspiracy;
4. Used automobiles to further their conspiracy by traveling to locations in rural Eastern, Oklahoma to facilitate the concealment and sale of stolen firearms;
5. Used cellular telephones, via standard cellular telephone service and social media platforms, to communicate with co-conspirators both known and unknown to the Grand Jury and with a prospective firearms buyer.

OVERT ACTS

In furtherance of the conspiracy and to effect the objects of it, the defendant's and others known and unknown to this Grand Jury, committed the following overt acts, among others, in the Eastern District of Oklahoma and elsewhere:

1. On or about October 26, 2021, **TERRY WAYNE HUNTER** provided a vehicle to transport four firearms to a meeting location.
2. On or about October 26, 2021, **DALTON ELZIE HUNTER** and **TERRY WAYNE HUNTER** arranged the sale of four firearms to a prospective buyer for \$1200.
3. On or about October 26, 2021, **DALTON ELZIE HUNTER** and **TERRY WAYNE HUNTER** moved four firearms from a flatbed truck into **TERRY WAYNE HUNTER's** 2017 black Chevy Silverado to transport the four firearms.
4. During a traffic stop, on or about October 26, 2021, **TERRY WAYNE HUNTER** attempted to conceal the four firearms from law enforcement officers in the rear seat of the 2017 black Chevy Silverado.
5. All in violation of Title 18, United States Code, Section 371.

COUNT TWO

**FELON IN POSSESSION OF A FIREARM
[18 U.S.C. §§ 922(g)(1), 924(a)(2) & 2]**

On or about October 26, 2021, in the Eastern District of Oklahoma, the Defendants, **DALTON ELZIE HUNTER** and **TERRY WAYNE HUNTER**, having been convicted of a crime punishable by imprisonment for a term exceeding one year, and knowing of such conviction, did knowingly possess in and affecting commerce, the following firearm, to-wit:

- One (1) Mossberg, Model 935, 12-gauge shotgun, semi-automatic, serial number AMC87208;
- One (1) Remington, Model 700, .243 caliber rifle, bolt-action, serial number F6288881;
- One (1) Remington, Model 870, 12-gauge shotgun, pump-action, serial number AB648859M; and
- One (1) Savage Axis, 30/06 Springfield rifle, bolt-action, serial number H944659;

which had been shipped and transported in interstate commerce, in violation of Title 18, United States Code, Sections 922(g)(1), 924(a)(2) and 2.

COUNT THREE

**POSSESSION OF STOLEN FIREARM
[18 U.S.C. § 922(j), 924(a)(2) & 2]**

On or about October 26, 2021 in the Eastern District of Oklahoma, the Defendants, **DALTON ELZIE HUNTER** and **TERRY WAYNE HUNTER**, knowingly possessed a stolen firearm, that is,


- One (1) Mossberg, Model 935, 12-gauge shotgun, semi-automatic, serial number AMC87208;
- One (1) Remington, Model 700, .243 caliber rifle, bolt-action, serial number F6288881;
- One (1) Remington, Model 870, 12-gauge shotgun, pump-action, serial number AB648859M; and

- One (1) Savage Axis, 30/06 Springfield rifle, bolt-action, serial number H944659; which had been shipped and transported in interstate commerce, knowing, and having reasonable cause to believe the firearms were stolen, in violation of Title 18, United States Code, Sections 922(j), 924(a)(2) and 2.

A TRUE BILL:

Pursuant to the E-Government Act,
the original indictment has been filed
under seal in the Clerk's Office.

CHRISTOPHER J. WILSON
Acting United States Attorney

A handwritten signature in black ink, appearing to read "Will Cosner", is written over a horizontal line.

WILL COSNER, OK BAR # 31827
Assistant United States Attorney

s / Foreperson
FOREPERSON OF THE GRAND JURY